

# **EXHIBIT A**

**JOINT LETTER BRIEF ON JCCP PLAINTIFFS' REQUEST TO EXPAND PRE-2012  
DOCUMENT DISCOVERY OF META**

Feature	Feature Search Term	Time Period
CSAM User Reporting	(CSAM OR CSE OR CSER OR CEI OR predator* OR "bad actor*" OR NCMEC OR porn* OR abuse* OR exploit* OR sex*) AND (teen* OR tween* OR adolescent* OR kid* OR youth* OR child* OR underage* OR juvenile* OR pre-teen* OR preteen* OR "gen* z" OR "genz" OR "gen-z" OR (gen w/2 "z") OR (generation w/2 "Z") OR (gen w/2 alpha) OR (generation w/2 alpha) OR "gen* alpha" OR "gena" OR ""gen-a""")	1/1/2010-12/31/2011
CSAM User Reporting	(report* w/15 (CSAM OR CSE OR CSER OR CEI OR predator* OR "bad actor*" OR NCMEC OR (child* w/2 (porn* OR abuse* or exploit* OR sex*)) OR "kiddie porn*"))	1/1/2010-12/31/2011
Endless Scroll	"ephemeral content"	1/1/2009-12/31/2011
Endless Scroll	("You're All Caught Up" OR "YACU")	1/1/2009-12/31/2011
Endless Scroll	autoplay OR "auto-play" OR "auto play"	1/1/2009-12/31/2011
Endless Scroll	begin* w/5 feed*	1/1/2009-12/31/2011
Endless Scroll	begin* w/5 "news feed"	1/1/2009-12/31/2011
Endless Scroll	begin* w/5 newsfeed*	1/1/2009-12/31/2011
Endless Scroll	begin* w/5 scroll*	1/1/2009-12/31/2011
Endless Scroll	end* w/5 feed*	1/1/2009-12/31/2011
Endless Scroll	end* w/5 "news feed"	1/1/2009-12/31/2011
Endless Scroll	end* w/5 newsfeed*	1/1/2009-12/31/2011
Endless Scroll	end* w/5 scroll*	1/1/2009-12/31/2011
Endless Scroll	endless* w/5 feed*	1/1/2009-12/31/2011
Endless Scroll	endless* w/5 "news feed"	1/1/2009-12/31/2011
Endless Scroll	endless* w/5 "news feed"	1/1/2009-12/31/2011
Endless Scroll	endless* w/5 newsfeed*	1/1/2009-12/31/2011

Feature	Feature Search Term	Time Period
Endless Scroll	endless* w/5 newsfeed*	1/1/2009-12/31/2011
Endless Scroll	endless* w/5 scroll*	1/1/2009-12/31/2011
Endless Scroll	endless* w/5 scroll*	1/1/2009-12/31/2011
Endless Scroll	infinit* w/5 feed*	1/1/2009-12/31/2011
Endless Scroll	infinit* w/5 "news feed""	1/1/2009-12/31/2011
Endless Scroll	infinit* w/5 newsfeed*	1/1/2009-12/31/2011
Endless Scroll	infinit* w/5 scroll*	1/1/2009-12/31/2011
Endless Scroll	"never ending" w/5 feed*	1/1/2009-12/31/2011
Endless Scroll	"never ending" w/5 "news feed""	1/1/2009-12/31/2011
Endless Scroll	"never ending" w/5 newsfeed*	1/1/2009-12/31/2011
Endless Scroll	"never ending" w/5 scroll*	1/1/2009-12/31/2011
Endless Scroll	"never-ending" w/5 feed*	1/1/2009-12/31/2011
Endless Scroll	"never"-ending w/5 "news feed""	1/1/2009-12/31/2011
Endless Scroll	"never-ending" w/5 newsfeed*	1/1/2009-12/31/2011
Endless Scroll	"never-ending" w/5 scroll*	1/1/2009-12/31/2011
Endless Scroll	passive w/5 feed*	1/1/2009-12/31/2011
Endless Scroll	passive w/5 "news feed""	1/1/2009-12/31/2011
Endless Scroll	passive w/5 newsfeed*	1/1/2009-12/31/2011
Endless Scroll	passive w/5 scroll*	1/1/2009-12/31/2011
Endless Scroll	paus* w/5 feed*	1/1/2009-12/31/2011
Endless Scroll	paus* w/5 "news feed""	1/1/2009-12/31/2011
Endless Scroll	paus* w/5 newsfeed*	1/1/2009-12/31/2011
Endless Scroll	paus* w/5 scroll*	1/1/2009-12/31/2011
Facebook Chat	(messag* OR chat* OR conversation* OR "DM") w/15 (teen* OR tween* OR adolescent* OR kid*)	1/1/2008-12/31/2011

Feature	Feature Search Term	Time Period
	OR youth* OR child* OR underage* OR juvenile* OR pre-teen* OR preteen* OR "gen* z" OR "genz" OR "gen-z" OR (gen w/2 "z") OR (generation w/2 "Z") OR (gen w/2 alpha) OR (generation w/2 alpha) OR "gen* alpha" OR "gena" OR "gen-a")	
Facebook Chat	(private w/15 (messag* OR chat* OR conversation* OR "DM"))	1/1/2008-12/31/2011
Friend Recommendations	"Accounts To Follow"	1/1/2008-12/31/2011
Friend Recommendations	"complementary activ*"	1/1/2008-12/31/2011
Friend Recommendations	"complementary interest*"	1/1/2008-12/31/2011
Friend Recommendations	"complementary profile*"	1/1/2008-12/31/2011
Friend Recommendations	"friends in common"	1/1/2008-12/31/2011
Friend Recommendations	"People You May Know"	1/1/2008-12/31/2011
Friend Recommendations	"PYMK"	1/1/2008-12/31/2011
Friend Recommendations	"similar activit*"	1/1/2008-12/31/2011
Friend Recommendations	"similar interest*"	1/1/2008-12/31/2011
Friend Recommendations	"similar network*"	1/1/2008-12/31/2011
Friend Recommendations	"similar profile*"	1/1/2008-12/31/2011
Friend Recommendations	(recommend* OR suggest* OR "you should" ) w/15 (pedo* OR predator* OR groom*)	1/1/2008-12/31/2011

Feature	Feature Search Term	Time Period
Geolocation	"in this location" w/1 (recently OR living OR traveling)	1/1/2010-12/31/2011
Geolocation	("location target*" OR "geo-target*" OR "geotarget*" OR "geofencing")	1/1/2010-12/31/2011
Geolocation	geo w/5 locat*	1/1/2010-12/31/2011
Geolocation	geolocat*	1/1/2010-12/31/2011
Hashtags	("Hash tag" OR "hashtag" OR "hash sign" OR "hashsign" OR (categor* w/2 classif*)) w/5 (moderat* OR violat* OR "down rank*")	1/1/2010-12/31/2011
Hashtags	("Hash tag" OR "hashtag" OR "hash sign" OR "hashsign" OR (categor* w/2 classif*)) AND (teen* OR tween* OR adolescent* OR kid* OR youth* OR child* OR underage* OR juvenile* OR pre-teen* OR preteen* OR ""gen* z"" OR ""genz"" OR ""gen-z"" OR (gen w/2 ""z"") OR (generation w/2 ""Z"") OR (gen w/2 alpha) OR (generation w/2 alpha) OR ""gen* alpha"" OR ""gena"" OR ""gen-a""")	1/1/2010-12/31/2011
Likes	"awesome button"	1/1/2009-12/31/2011
Likes	"comment button"	1/1/2009-12/31/2011
Likes	"comment feature"	1/1/2009-12/31/2011
Likes	"comment plugin"	1/1/2009-12/31/2011
Likes	"like button"	1/1/2009-12/31/2011
Likes	"like feature"	1/1/2009-12/31/2011
Likes	"like plugin"	1/1/2009-12/31/2011
Likes	"likes/comments"	1/1/2009-12/31/2011
Likes	"more likes" or "less likes" or "fewer likes" or "greater likes" or "of likes"	1/1/2009-12/31/2011
Likes	"project daisy" OR "pure daisy" OR "popular daisy" OR "purple daisy" OR "blue daisy" OR "daisy like"	1/1/2009-12/31/2011

Feature	Feature Search Term	Time Period
Likes	"social plugins"	1/1/2009-12/31/2011
Likes	"thumbs up"	1/1/2009-12/31/2011
Likes	like w/ 15 (notif* OR engag*)	1/1/2009-12/31/2011
Likes	likebait or "like bait"	1/1/2009-12/31/2011
Likes	props	1/1/2009-12/31/2011
Newsfeed + Algorithmic Recommendations	("EdgeRank" or "Edge Rank")	1/1/2006-12/31/2011
Newsfeed + Algorithmic Recommendations	("news feed*") AND (increas* w/5 engage*)	1/1/2006-12/31/2011
Newsfeed + Algorithmic Recommendations	("news feed*") AND (increas* w/5 use)	1/1/2006-12/31/2011
Newsfeed + Algorithmic Recommendations	(algo* w/5 content*) AND (increas* w/5 engage*)	1/1/2006-12/31/2011
Newsfeed + Algorithmic Recommendations	(algo* w/5 content*) AND (increas* w/5 use)	1/1/2006-12/31/2011
Newsfeed + Algorithmic Recommendations	(algo* w/5 rank*) AND (increas* w/5 engage*)	1/1/2006-12/31/2011
Newsfeed + Algorithmic Recommendations	(algo* w/5 rank*) AND (increas* w/5 use)	1/1/2006-12/31/2011
Newsfeed + Algorithmic Recommendations	(algo* w/5 recommend*) AND ("problematic use*" or "social compar*" or "rabbit hole" or "rabbithole" or "habit loop")	1/1/2006-12/31/2011
Newsfeed + Algorithmic Recommendations	(algo* w/5 recommend*) AND (feed*)	1/1/2006-12/31/2011

Feature	Feature Search Term	Time Period
Newsfeed + Algorithmic Recommendations	(algo* w/5 recommend*) AND (increas* w/5 engage*)	1/1/2006-12/31/2011
Newsfeed + Algorithmic Recommendations	(algo* w/5 recommend*) AND (increas* w/5 use)	1/1/2006-12/31/2011
Notifications	"turn off" w/10 notif*	1/1/2011-12/31/2011
Notifications	adjust* w/10 notif*	1/1/2011-12/31/2011
Notifications	bed* w/10 notif*	1/1/2011-12/31/2011
Notifications	bombard* w/10 notif*	1/1/2011-12/31/2011
Notifications	evening w/10 notif*	1/1/2011-12/31/2011
Notifications	excessiv* w/10 notif*	1/1/2011-12/31/2011
Notifications	incessant* w/10 notif*	1/1/2011-12/31/2011
Notifications	midnight w/10 notif*	1/1/2011-12/31/2011
Notifications	"never ending" w/10 notif*	1/1/2011-12/31/2011
Notifications	"never-ending" w/10 notif*	1/1/2011-12/31/2011
Notifications	night w/10 notif*	1/1/2011-12/31/2011
Notifications	"non stop" w/10 notif*	1/1/2011-12/31/2011
Notifications	nonstop w/10 notif*	1/1/2011-12/31/2011
Notifications	"non-stop" w/10 notif*	1/1/2011-12/31/2011
Notifications	number w/10 notif*	1/1/2011-12/31/2011
Notifications	push w/10 notif*	1/1/2011-12/31/2011
Notifications	repeat* w/10 notif*	1/1/2011-12/31/2011
Notifications	sleep* w/10 notif*	1/1/2011-12/31/2011
Notifications	tim* w/10 notif*	1/1/2011-12/31/2011
Notifications	"too many" w/10 notif*	1/1/2011-12/31/2011